

(Rev. 5/05)

**FORM TO BE USED BY A PRISONER IN FILING A COMPLAINT  
UNDER THE CIVIL RIGHTS ACT, 42 U.S.C. §1983**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

(1) James St. Louis 446518  
 (Name of Plaintiff) (Inmate Number)  
Delaware Correctional Center  
1181 Paddock Road Smyrna DE  
 (Complete Address with zip code) 19977

(2) None  
 (Name of Plaintiff) (Inmate Number)

None  
 (Complete Address with zip code)

(Each named party must be listed, and all names  
must be printed or typed. Use additional sheets if needed)

vs.

(1) RALPH HEVERIN  
 (2) DAVID PIERCE  
 (3) OFFICER <sup>Bennie</sup> WILLIAMS et al.  
 (Names of Defendants)

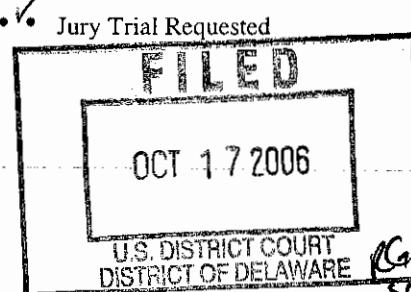
(Each named party must be listed, and all names  
must be printed or typed. Use additional sheets if needed)

**I. PREVIOUS LAWSUITS**

A. If you have filed any other lawsuits in federal court while a prisoner, please list the caption and case number including year, as well as the name of the judicial officer to whom it was assigned:

St. Louis v. Morris et al 1:06-cv-236  
Judge Sue Robinson Doc # 11 9/26/2006

St. Louis v. Wilson et al 1:05-cv-38  
Judge Sue Robinson 2005



## II. EXHAUSTION OF ADMINISTRATIVE REMEDIES

In order to proceed in federal court, you must fully exhaust any available administrative remedies as to each ground on which you request action.

- A. Is there a prisoner grievance procedure available at your present institution?  Yes • No
- B. Have you fully exhausted your available administrative remedies regarding each of your present claims?  Yes • No
- C. If your answer to "B" is Yes:
  1. What steps did you take? took complaint to Deputy Warden and He assigned a Lt to investigate Appeal.
  2. What was the result? AFTER investigation decide to hold ANOTHER disciplinary hearing despite investigator agreeing that original disciplinary report was vindictive.
- D. If your answer to "B" is No, explain why not: \_\_\_\_\_  
\_\_\_\_\_

## III. DEFENDANTS (in order listed on the caption)

- (1) Name of first defendant: RAIPH HEVERIN  
 Employed as HEARING OFFICER at Delaware Correctional Center  
 Mailing address with zip code: 1181 Paddock Road  
Smyrna De. 19977
- (2) Name of second defendant: Deputy WARDEN Pierce  
 Employed as Deputy Warden at Delaware Correctional Center  
 Mailing address with zip code: 1181 Paddock Road  
Smyrna De. 19977
- (3) Name of third defendant: HEARING OFFICER WILLIAMS  
 Employed as HEARING OFFICER at Delaware Correctional Center  
 Mailing address with zip code: 1181 Paddock Road  
Smyrna De. 19977

(List any additional defendants, their employment, and addresses with zip codes, on extra sheets if necessary)

*and any one else the judicial system deems responsible and who should be held accountable.*

#### IV. STATEMENT OF CLAIM

(State as briefly as possible the facts of your case. Describe how each defendant is involved, including dates and places. Do not give any legal arguments or cite any cases or statutes. Attach no more than three extra sheets of paper if necessary.)

1. Basic problems started 3/8/2005 with meeting with Lt Morris & Lt Legales after Lt Louis had complained to Lt. Legales about constitutional issues and threats and bribery against 1st Cook Goron on 3rd cooks. Was told in meeting per Morris which included Goron that he is discharged no matter what
2. On 3/19/2005 another meeting about threats and firing inmates by 1st cook and Lt Morris said had to follow procedures. Had to first give notice of infraction so they would be consulting by assigned officer for counselor report before anyone can be fired. And also asked us at that time who we wanted fired out of kitchen and talked about how to handle it. He informed us she would talk to "her" officers and have them comply to our wishes. Since then interviews for promotions have been done with Goron offering questions and promotions to inmates for commissary. These guys comply got the questions he would ask
3. RELIEF see exhibit B

(State briefly exactly what you want the Court to do for you. Make no legal arguments. Cite no cases or statutes.)

1. Lt Louis is asking those involved whether action or inaction to be held accountable in their personal and official capacity not only for procedure violations but also for the double and triple jeopardy shown in a 1 instance complaint. Lt. Louis want compensation for stress from mental, verbal and emotional abuse suffered along with humiliation and embarrassed. Lt Louis would like to see an injunction filed on main kitchen and department of Corrections to force them to follow their own procedures in future

2. There already is in front of Judge Sue  
Robinson a civil action against the  
Main Kitchen officials for retaliation  
and hopes this incident at the main  
building can be taken care of so that
3. In the future anyone who wants to appeal a  
firing and constitutional violation will not  
be punished further for trying to regain  
due process.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 13 day of October, 2006.

James St. Louis  
(Signature of Plaintiff 1)

\_\_\_\_\_  
(Signature of Plaintiff 2)

\_\_\_\_\_  
(Signature of Plaintiff 3)

Certificate of Service

I, James St Louis, hereby certify that I have served a true  
and correct cop(ies) of the attached: Civil Rights Act  
42 USC § 1983 upon the following  
parties/person (s):

TO: Office of the Clerk  
United States District Court  
844 N. King St. Lockbox 18  
Wilmington  
Delaware 19801-3590

TO: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

TO: Deputy Attorney General  
Department of Justice  
820 N. French Street  
Wilmington  
Delaware 19801

TO: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

BY PLACING SAME IN A SEALED ENVELOPE and depositing same in the United States Mail at the Delaware Correctional Center, 1181 Paddock Road, Smyrna, DE 19977.

On this 14 day of October, 2006

James St Louis

IM James A. Janice  
SBI# 446518 UNIT MH4 22A(5K)

DELAWARE CORRECTIONAL CENTER

1181 PADDOCK ROAD

SMYRNA, DELAWARE 19977

WISD  
WISCONSIN

Legal  
mail

Office of the Clerk

United States District Court

844 N. King St. Newark, DE  
Wilmington, DE.

19801-3570

Legal  
mail

